The Honorable James L. Robart 1 2 3 4 5 UNITED STATES DISTRICT COURT 6 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 7 8 MICROSOFT CORPORATION, a Washington corporation, CASE NO. C10-1823-JLR 9 Plaintiff, DEFENDANTS' NONOPPOSITION TO 10 MICROSOFT'S 3/30/12 MOTION TO FILE DOCUMENTS UNDER SEAL 11 v. NOTED ON MOTION CALENDAR: 12 MOTOROLA, INC., and MOTOROLA Friday, April 20, 2012 MOBILITY, INC., and GENERAL 13 INSTRUMENT CORPORATION, 14 Defendants. 15 16 MOTOROLA MOBILITY, INC., and GENERAL INSTRUMENT CORPORATION, 17 Plaintiffs/Counterclaim Defendant, 18 19 v. 20 MICROSOFT CORPORATION, 21 Defendant/Counterclaim Plaintiff. 22 23 24 25 26

DEFENDANTS' NONOPPOSITION TO MICROSOFT'S 3/30/12 MOTION TO FILE DOCUMENTS UNDER SEAL CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC

315 FIFTH AVENUE SOUTH, SUITE 1000 SEATTLE, WASHINGTON 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001 1

Defendants do not oppose Microsoft's 03/30/12 Motion to Seal (ECF No. 234) re the following documents in support of Microsoft's Motion for Summary Judgment of Breach of Contract (ECF No. 237, redacted version):

- Limited portions of Microsoft's Motion for Summary Judgment of Breach of Contract;
- Exhibits 12 and 15-19 to the 03/30/12 Declaration of Christopher Wion in Support of Microsoft's Motion for Summary Judgment of Breach of Contract

Nothing herein is intended as a waiver of Defendants' right to contest Microsoft's designation of material as Confidential Business Information in accordance with the terms of the Protective Order entered on July 21, 2011 (ECF No. 72). Defendants expressly reserve the right to do so as the circumstances warrant.

DATED this 18th day of April, 2012.

SUMMIT LAW GROUP PLLC

By /s/ Ralph H. Palumbo
Ralph H. Palumbo, WSBA #04751
Philip S. McCune, WSBA #21081
Lynn M. Engel, WSBA #21934
ralphp@summitlaw.com
philm@summitlaw.com
lynne@summitlaw.com

By /s/ K. McNeill Taylor, Jr.

K. McNeill Taylor, Jr. MOTOROLA MOBILITY, INC. MD W4-150 600 North U.S. Highway 45 Libertyville, IL 60048-1286 Phone: 858-404-3580 Fax: 847-523-0727

DEFENDANTS' NONOPPOSITION TO MICROSOFT'S 3/30/12 MOTION TO FILE DOCUMENTS UNDER SEAL - 1 CASE NO. C10-1823-JLR

SEATTLE, WASHINGTON 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001

1	And by
2	Steven Pepe (<i>pro hac vice</i>) Jesse J. Jenner (<i>pro hac vice</i>)
3	Stuart W. Yothers (<i>pro hac vice</i>) Ropes & Gray LLP
4	1211 Avenue of the Americas
5	New York, NY 10036-8704 (212) 596-9046
6	steven.pepe@ropesgray.com jesse.jenner@ropesgray.com
	stuart.yothers@ropesgray.com
7	Norman H. Beamer (pro hac vice)
8	Gabrielle E. Higgins (<i>pro hac vice</i>) Ropes & Gray LLP
9	1900 University Avenue, 6 th Floor
10	East Palo Alto, CA 94303-2284 (650) 617-4030
	norman.beamer@ropesgray.com
11	gabrielle.higgins@ropesgray.com
12	Paul M. Schoenhard (<i>pro hac vice</i>) Kevin J. Post (<i>pro hac vice</i>)
13	Ropes & Gray LLP
	One Metro Center
14	700 12 th Street NW, Suite 900 Washington, DC 20005-3948
15	(202) 508-4693
16	paul.schoenhard.@ropesgray.com kevin.post@ropesgray.com
16	
17	Attorneys for Motorola Solutions, Inc., Motorola Mobility, Inc., and General Instrument
18	Corporation
19	
20	
21	
22	
23	
24	
25	
26	

DEFENDANTS' NONOPPOSITION TO MICROSOFT'S 3/30/12 MOTION TO FILE DOCUMENTS UNDER SEAL - 2 CASE NO. C10-1823-JLR

Telephone: (206) 676-7000 Fax: (206) 676-7001

CERTIFICATE OF SERVICE 1 I hereby certify that on this day I electronically filed the foregoing with the Clerk of the 2 Court using the CM/ECF system which will send notification of such filing to the following: 3 Arthur W. Harrigan, Jr., Esq. 4 Christopher T. Wion, Esq. Shane P. Cramer, Esq. 5 Danielson, Harrigan, Leyh & Tollefson LLP arthurh@dhlt.com 6 chrisw@dhlt.com shanec@dhlt.com 7 Brian R. Nester, Esq. 8 David T. Pritikin, Esq. Douglas I. Lewis, Esq. 9 John W. McBride, Esq. Richard A. Cederoth, Esq. 10 David Greenfield, Esq. William H. Baumgartner, Jr., Esq. 11 David C. Giardina, Esq. Carter G. Phillips, Esq. 12 Constantine L. Trela, Jr., Esq. 13 Ellen S. Robbins, Esq. Nathaniel C. Love, Esq. 14 Sidley Austin LLP bnester@sidley.com 15 dpritikin@sidley.com dilewis@sidley.com 16 jwmcbride@sidley.com rcederoth@sidlev.com 17 david.greenfield@sidley.com wbaumgartner@sidley.com 18 dgiardina@sidley.com cphillips@sidley.com 19 ctrela@sidley.com erobbins@sidley.com 20 nlove@sidley.com 21 T. Andrew Culbert, Esq. 22 David E. Killough, Esq. Microsoft Corp. 23 andycu@microsoft.com davkill@microsoft.com 24 DATED this 18th day of April, 2012. 25 /s/ Marcia A. Ripley 26 Marcia A. Ripley

DEFENDANTS' NONOPPOSITION TO MICROSOFT'S 3/30/12 MOTION TO FILE DOCUMENTS UNDER SEAL - 3 CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC

315 FIFTH AVENUE SOUTH, SUITE 1000 SEATTLE, WASHINGTON 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001